

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TEKLA BALFOUR-BROWNE, on behalf of himself and  
all others similarly situated,

Plaintiffs,

-against-

EDEN FINE ART NY INC. d/b/a EDEN  
GALLERY, CATHIA KLIMOVSKY, GUY  
MARTINOVSKY, GAL YOSEF, and CETRA ART  
CORPORATION,

Defendants.

25-cv-1142

**DECLARATION OF JASON GOTTLIEB IN SUPPORT OF DEFENDANTS' MOTION  
TO DISMISS**

I, JASON GOTTLIEB, pursuant to 28 U.S.C. § 1746, state and declare as follows:

1. I am (a) over 18 years of age, (b) an attorney with Morrison Cohen LLP, counsel to Defendants Eden Fine Art NY Inc., Cathia Klimovsky, Guy Martinovsky, Gal Yosef, and Cetra Art Corporation (“Defendants”) in the above-captioned case, and (c) a member of the bar of (i) the State of New York, and (ii) the United States District Court for the Southern District of New York.

2. I respectfully submit this declaration (“Declaration”) in support of Defendants’ Motion to Dismiss the Complaint.

3. Attached as **Exhibit A** to this Declaration is a true and correct copy of the Terms of Service that are publicly available on the Galyverse website, <https://galyverse.io/terms.pdf>.

4. I declare under the penalty of perjury that the foregoing is true and correct. Executed this 31 day of March, 2025, in New York, New York.

*/s/ Jason Gottlieb*  
JASON GOTTLIEB